



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

January 22, 2008

Chip Hall
Project Planning Branch
U.S. Army Corps of Engineers, Nashville District
P.O. Box 1070
Nashville, Tennessee 37202-1070

SUBJECT: Final Environmental Impact Statement for Wolf Creek Dam/Lake Cumberland Project, Emergency Measures in Response to Seepage in Jamestown, Kentucky; CEQ Number 20070530

Dear Mr. Hall:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Wolf Creek Project, owned and operated by the U.S. Army Corps of Engineers (USACE), is located on the Cumberland River near Jamestown, Kentucky. The Wolf Creek Dam is a combination earthen fill and concrete structure approximately 5,736 feet long and 258 feet high. Lake Cumberland, created by the dam, has a drainage area of 5,789 square miles and a surface area of approximately 63,530 acres.

Since the 1960s, seepage through the dam's foundation has been a concern. In recent years, the problems have increased and the dam is now classified as being in an active failure mode. To address these problems, the USACE developed specific dam repair and remediation projects in 2006 and 2007. At the time, no significant changes to the normal pool elevations were considered necessary. However, the repairs identified will take a number of years to complete and the risk of potential dam failure will increase during this time. Therefore as a proactive measure, the USACE proposes to evaluate different interim lake elevations to reduce the hydrostatic pressure and potential risk of dam failure. When repairs are complete, the Wolf Creek Project would return to normal operations.

In the review of the Draft EIS, EPA raised environmental concerns related to water quantity and water quality in the reservoir and project dam releases. The preferred alternative is projected to have severe impacts to aquatic resources and water quality. EPA requested inclusion of a decision-making process to consider higher future lake levels at Lake Cumberland and the identification of specific mitigation measures. EPA appreciates the inclusion of a description of this adaptive management decision-making process in the Final EIS that applies to the preferred alternative. The process should allow for incremental changes in lake elevations depending on the continued satisfactory results of performance indicators and structural improvements to the dam's foundation. This adaptive management approach should hopefully

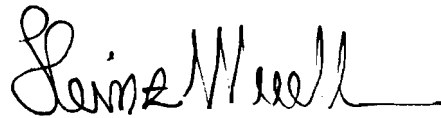
allow for opportunities to minimize the long-term environmental impacts of the temporary drawdown.

EPA also appreciates the inclusion of an "Environmental Commitments" section in the Final EIS that specifies installation of an orifice gate over the sluice gate to provide adequate minimum flow releases with higher levels of dissolved oxygen, as well as a commitment to public outreach during this time of interim operations. EPA supports these measures and the continuation of current water quality monitoring in the project tailwater to determine changes in project conditions over the course of the proposed dam repair project. In addition to these measures, EPA also continues to recommend implementation of the additional mitigation measures described in the Final EIS, including blending the turbine and sluice gate discharges and the provision of supplemental flows from other Cumberland River tributary lakes to make up for lower flows from Wolf Creek.

In summary, while EPA continues to have concerns with water quantity and water quality impacts associated with implementation of Alternative 2, EPA supports the other mitigation measures and monitoring programs as described in the Final EIS. We appreciate the USACE's commitment to implement these practices to protect water quality and aquatic habitat. EPA recommends clear identification of the adaptive management decision-making process and inclusion of all mitigation commitments in the Record of Decision for the project.

We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a long horizontal line extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Tennessee Department of Environment and Conservation